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Gabriela D. Flowers, SBN 273850 Travis E. Cochran, SBN 285776 **LOZANO SMITH** One Capitol Mall, Suite 640 Sacramento, CA 95814 Telephone: (916) 329-7433 Facsimile: (916) 329-9050 5 8 9 10 12 13 VS. 14 SHERER,

Attorneys for Defendants, CALIFORNIA PINES COMMUNITY SERVICES DISTRICT, RON SHERER and RYAN SHERER

Anne L. Collins, SBN 244287

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

CHAD COATES, JOSHUA B. LUSK, JOSHUA C. HICKS, JORDAN C. VERECE,

Plaintiffs,

CALIFORNIA PINES COMMUNITY SERVICES DISTRICT, RON SHERER, RYAN

Defendants.

Case No. 2:20-cv-01112-KJM-DMC

STIPULATION REGARDING EXTENSION OF TIME FOR NON-EXPERT AND **EXPERT DISCOVERY DEADLINES; ORDER**

(L.R. 144)

Plaintiffs Chad Coates et al., ("Plaintiffs") and Defendants California Pines Community Services District ("District") et al., ("Defendants") (collectively herein, "Parties"), through their respective counsel of record, hereby stipulate to an extension of time for Non-Expert and Expert Discovery deadlines in the above-captioned action and agree as follows:

- 1. WHEREAS, the Parties acknowledge that the Court's Order directs that requests to extend a deadline must be submitted and approved by the Court (Document No. 23);
- 2. WHEREAS, on June 10, 2021, the Parties filed a Stipulation Regarding Extension of Time for Non-Expert and Expert Discovery Deadlines; [Proposed] Order (Document 26), stipulating to a sixty

Stipulation Re: Extension of Time for Non-Expert and Expert Discovery Deadlines; [Proposed] Order

Coates et al. v. CA Pines et al. Case No. 2:20-cv-01112-KJM-DMC 1

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(60) day extension to complete non-expert and expert discovery and requesting the Court approve the same;

- 3. WHEREAS, on June 24, 2021, the Court approved the Parties request and ordered that the non-expert and expert discovery deadlines by extended by sixty (60) days (Document 27);
- 4. WHEREAS, the Parties desire an additional extension to complete non-expert and expert discovery to allow the Parties to continue to engage in discussions regarding potential settlement of the matter and seek to avoid any additional costs while engaging in such discussions; and
- 5. WHEREAS, the Parties also recognize that many of the relevant individuals in this matter are engaged in firefighter-related services and that additional time to complete non-expert and expert discovery may be necessary due to the ongoing wildfire season.
- 6. THEREFORE, the Parties hereby stipulate and request that the Court continue the deadline for the Parties to complete non-expert discovery and all motions pertaining to non-expert discovery by sixty (60) days, to October 29, 2021.
- 7. THEREFORE, the Parties hereby stipulate and request that the Court continue the deadline for the Parties to complete expert discovery and all motions pertaining to expert discovery by sixty (60) days, to January 7, 2022.
- 8. THEREFORE, the Parties hereby stipulate and request that the Court continue the deadline for the Parties to exchange initial lists of expert witnesses by sixty (60) days, to November 29, 2021. IT IS SO STIPULATED.

As Authorized on July 20, 2021

Respectfully Submitted,

LAW OFFICE OF STEPHAN R. WATTENBERG

/s/ Stephan R. Wattenberg
STEPHAN R. WATTENBERG
Attorney for Plaintiffs
Chad Coates, Joshua B. Lusk, Joshua C. Hicks,
Jordan C. Verece

[SIGNATURES CONTINUED ON NEXT PAGE]

Stipulation Re: Extension of Time for Non-Expert and Expert Discovery Deadlines; [Proposed] Order

- 2 -

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1	Dated: July 20, 2021	Respectfully Submitted,
1 2		LOZANO SMITH
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4		/s/ Anne L. Collins
5		ANNE L. COLLINS GABRIELA D. FLOWERS
		TRAVIS C. COCHRAN Attorneys for Defendants
6 7		California Pines Community Services District, Ron Sherer, Ryan Sherer
8		Kon Sherer, Kyan Sherer
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Stipulation Re: Extension of Time for Non-Expert and Expert Discovery Deadlines; [Proposed] Order

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ORDER

Pursuant to the foregoing Stipulation of the Parties, and GOOD CAUSE APPEARING THEREFORE, IT IS HEREBY ORDERED:

- 1. The deadline for the Parties to complete non-expert discovery and all motions pertaining to non-expert discovery is extended by sixty (60) days, to October 29, 2021.
- 2. The deadline for the Parties to complete expert discovery and all motions pertaining to expert discovery is extended by sixty (60) days, to January 7, 2022.
- 3. The deadline for the Parties to exchange initial lists of expert witnesses is extended by sixty (60) days, to November 29, 2021.

IT IS SO ORDERED.

Dated: August 12, 2021

DENNIS M. COTA UNITED STATES MAGISTRATE JUDGE